

**OFFICE OF THE STANDING CHAPTER 13 TRUSTEE
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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

IN RE:

Case No: 24-42011-ELM

**NICHOLAS ROBERT VINCENT
MARY ELLEN ROBINSON
Debtors,**

**Court Hearing:
Time & Date: 8:30 AM on
Thursday, September 5, 2024**

TRUSTEE'S OBJECTION TO CONFIRMATION

TO THE HONORABLE EDWARD L MORRIS, U.S. BANKRUPTCY JUDGE:

Now comes Tim Truman, the Standing Chapter 13 Trustee, and files this his "Trustee's Objection to Confirmation" of the Plan heretofore filed herein by Debtors, and for the same would respectfully show the Court as follows:

The Plan fails to meet the "feasibility" requirements of 11 U.S.C. Section 1325 (a) (6) of the Bankruptcy Code. In this regard, the Trustee would show that the Debtors' proposed Plan provides for the following plan payments:

DEBTOR PAY SCHEDULE NO. 1 (NICHOLAS ROBERT VINCENT)

PAYMENTS BEGINNING: 07/10/2024 FOR 60 MONTHS IN THE AMOUNT OF: \$570.00

The Debtors' monthly surplus per Schedules I and J is \$-474.96. Therefore, the Plan does not appear to be feasible for that reason, and for the following reason(s) if any:

WHEREFORE, PREMISES CONSIDERED, the Trustee prays that said Plan not be confirmed unless and until it has been modified to cure all objections set forth hereinabove, and for general relief.

Respectfully submitted,

By: /s/ Angela D. Allen

Tim Truman, Bar # 20258000
Standing Chapter 13 Trustee
Angela Allen, Bar # 007869700
Staff Attorney

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing "Trustee's Objection to Confirmation" was served on all parties listed below in the manner listed below on or before July 26, 2024.

/s/ Angela D. Allen

Tim Truman, Angela Allen

BY FIRST CLASS MAIL:

NICHOLAS ROBERT VINCENT, MARY ELLEN ROBINSON, 1217 CAMDEN YARD DR, BURLESON, TX 76028-0000

BY ELECTRONIC SERVICE:

LEE LAW FIRM PLLC, 8701 BEDFORD EULESS RD STE 510, HURST, TX 76053

BARRY AND SEWART, 4151 SOUTHWEST FWY #680, HOUSTON, TX 77027

TOGETHER CREDIT UNION, 423 LYNCH ST, ST LOUIS, MO 63118

United States Trustee, 1100 COMMERCE STREET, ROOM 976, DALLAS, TX 75242